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9
10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Gabriela Meza Silva,

13 Case No.: 2:25-cv-00744

14 Plaintiff,

15 **16 Unopposed Motion for Extension of**
17 Time for Clarity Services, Inc. to Answer
(First Request)

18 v.

19 Equifax Information Services LLC; National
 20 Consumer Telecom & Utilities Exchange, Inc.;
 21 Clarity Services, Inc.; American Express
 22 Company; The Goldman Sachs Group, Inc.; First
 23 Bank & Trust; Bank of America, N.A.; Capital
 24 One Bank, National Association and Discover
 25 Financial Services, Inc.,

26 Defendants.

27
 28 Gabriela Meza Silva (“Plaintiff”), hereby files this Unopposed Motion for Extension of Time
 29 for Clarity Services, Inc. (“Defendant”) to Answer and in support states:

- 30 1. On May 6, 2025, Defendant was served with Plaintiff’s Complaint for Damages under the
 31 FCRA, 15 U.S.C. § 1681 (“Complaint”).
- 32 2. Accordingly, Defendant’s responsive pleading to the Complaint is due on May 27, 2025.
- 33 3. Defendant’s counsel has requested more time to complete their investigation of the Plaintiff’s
 34 claims and Defendant’s possible defenses.
- 35 4. In addition, Plaintiff and Defendant are actively engaged in case-resolution negotiations.

- 1 5. Plaintiff does not oppose an extension of Defendant's time to respond to the Complaint so
- 2 Defendant's counsel may complete its investigation into Plaintiff's claims and the parties may
- 3 continue to devote their energies to resolving this matter.
- 4 6. Therefore Plaintiff respectfully requests the Court for an extension of time for Defendant to
- 5 file its responsive pleading by 45 days, which is up to and including **July 11, 2025**.
- 6 7. This motion is filed in good faith and not for delay.
- 7 8. This is the first request for an extension of time for Defendant to answer the complaint and
- 8 the requested extension does not prejudice the parties.
- 9 9. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date
- 10 by which Defendant must answer or otherwise respond to Plaintiff's Complaint to **July 11,**
- 11 **2025**.

12 DATED May 27, 2025.
13

14
15 Respectfully submitted,

16 **FREEDOM LAW FIRM**
17

18 /s/ George Haines

19 George Haines, Esq.
20 Gerardo Avalos, Esq.
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22 Las Vegas, NV 89123
23 *Counsel for Plaintiff*

24 **GOOD CAUSE SHOWN, IT IS SO ORDERED:**
25

26 
27 Laynard J. Zouchah
28 UNITED STATES MAGISTRATE JUDGE

29 DATED: May 27, 2025